



**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

**MARTA MCCLANAHAN (fka MARTA
STINSON) & JESSICA STINSON**

Plaintiffs,

v.

MEDICREDIT, INC.

Defendant.

**Civil Case No. 3:19-cv-163
Chief Judge Crenshaw/Frensley**

PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiffs Marta McClanahan (McClanahan) and Jessica Stinson (Stinson) (collectively “Plaintiffs”), by and through counsel, and respectfully requests leave from the Court to file under seal the following documents, each being of which is being filed contemporaneously as a “Sealed Document” pursuant to Administrative Order No. 167, Section 5.07.

- 1) Conditions of Admission and Consent to Outpatient Care dated and signed by Marta McClanahan dated 11/26/2016.
- 2) Blue Cross Blue Shield of Tennessee Insurance Card of Marta M. Stinson (McClanahan).
- 3) Medical Statement from The Frist Clinic for Marta M. Stinson (McClanahan) dated 7/17/2018.
- 4) Medical Statement from Centennial Medical Center for Marta M. Stinson (McClanahan) dated 11/26/2016.

Plaintiffs McClanahan and Stinson request that the following documents be filed under

seal for the following reason:

- 1) The above medical documents contain sensitive private medical information which the Plaintiff McClanahan wishes to keep private.
- 2) Such documents are referenced in Plaintiffs' Memorandum in Support of Partial Summary judgment having been produced through discovery.
- 3) Opposing Counsel in this matter has no objection to these medical records and bills being filed under seal.

WHEREFORE, Plaintiffs McClanahan and Stinson respectfully requests this Honorable Court grant Leave to File Under Seal.

April 21, 2020

Respectfully submitted,

MARTA MCCLANAHAN
JESSICA STINSON

/s/ Brent S. Snyder
Brent S. Snyder, BPR #021700
2125 Middlebrook Pike
Knoxville, TN 37921
(865) 546-2141
Brentsnyder77@gmail.com

/s/ William M. Kaludis
William M. Kaludis, BPR #017433
SHIELD LAW GROUP
1230 2nd Ave. S.
Nashville, TN 37210-4110
Phone: (615) 742-8020
Fax: (615) 255-6037
bill@shieldlawgroup.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of April, 2020, a copy of PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated below. Parties may access this filing through the Court's electronic filing system.

Jamie N. Cotter
Spencer Fane LLP
1700 Lincoln Street
Suite 2000
Denver, CO 80203

Scott J. Dickenson
Spencer Fane LLP
1 N. Brentwood Blvd.
Suite 1000
St. Louis, MO 63105

Thomas William A. Caldwell
Ortale Kelley Law Firm
330 Commerce Street
Suite 110
P.O. Box 198985
Nashville, TN 37201

Wendy Lynne Longmire
Ortale, Kelley, Herbert & Crawford
330 Commerce Street
Suite 110
Nashville, TN 37201

4/21/2020

s/ Brent S. Snyder
Brent S. Snyder, Attorney for Plaintiffs